

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

LAWRENCE S. BRODSKY,)	
Individually and as the representative of)	
a class of similarly-situated persons)	
)	
Plaintiff,)	
)	
vs.)	
)	No.: 3:08-cv-50188
HUMANA, INC.,)	
)	
Defendant.)	

**AGREED MOTION FOR INITIAL EXTENSION OF TIME TO ANSWER
OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT**

Defendant, HUMANA, INC. ("Humana"), by its attorneys, William A. Chittenden III, Vittorio F. Terrizzi, and Chittenden, Murday & Novotny LLC, hereby moves for an initial extension of time to answer or otherwise plead to Plaintiff's Class Action Complaint ("Complaint"). In support of its Agreed Motion, Humana states as follows:

1. This civil action was filed on or about July 23, 2008, in the Circuit Court of the 22nd Judicial Circuit, McHenry County, Illinois, as Cause No. 08 LA 289. The Complaint was served on Defendant on July 28, 2008.
2. Humana timely filed a Notice of Removal, removing this matter to this Court on August 25, 2008.
3. Humana and its counsel require an additional period of time in which to gather additional file materials, evaluate Plaintiff's allegations, and prepare a good faith responsive pleading to same.

4. Humana therefore requests additional time, to and including September 29, 2008, in which to answer or otherwise plead to Plaintiff's Complaint.

5. Prior to filing this motion, undersigned counsel for Humana contacted Plaintiff's counsel, who advised that he has no objection to Humana's request for an extension of time to file its responsive pleading.

6. This motion is not brought to unnecessarily delay the proceedings in this matter, but is based on the good faith belief that an additional period of time is necessary in order to draft a good faith responsive pleading. The granting of this motion will not prejudice any party hereto.

WHEREFORE, HUMANA, INC. respectfully requests that this Honorable Court grant its requested extension of time and allow it until September 29, 2008, to answer or otherwise plead to Plaintiff's Class Action Complaint.

Respectfully submitted,

HUMANA, INC.

By: /s/Vittorio F. Terrizzi
One of its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2008 I caused the foregoing Agreed Motion for Initial Extension of Time to Answer or Otherwise Plead to Plaintiff's Complaint to be filed and served electronically through CM/ECF upon the following counsel of record:

Brian J. Wanca, Anderson & Wanca:	buslit@andersonwanca.com
Phillip A. Bock, Bock & Hatch, LLC:	phil@bockhatchllc.com
Ryan M. Kelly, Anderson & Wanca:	rkelly@andersonwanca.com

Dated: August 26, 2008.

By: /s/Vittorio F. Terrizzi